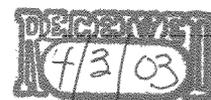


4-3-03

## TWENTYMILE COAL COMPANY



## BELT ENTRY AS AN INTAKE AIR COURSE

MSHA/OSRU

### INTRODUCTION

My Name is Dick Conkle and I am the Safety Manager for Twentymile Coal Company, located in Oak Creek, Colorado. My comments today are to supplement those comments previously submitted by our parent company, RAG American Coal Holding, Inc.

### ALERT AND ALARM LEVELS

Twentymile currently uses a 10 ppm alert level and a 15 ppm alarm level with using a zero ambient and would like to continue using this approach under the new regulations. An operator should be able to choose between 10 ppm alert and 15 ppm alarm with a zero ambient or choose a 5 ppm alert and 10 ppm alarm over a determined ambient, as long as the method chosen is stated in the Ventilation Plan and Mine Emergency Plan, which ever is appropriate. We are not aware of any documentation of an actual fire found during an investigation for a current alert level (10 ppm), which also never reached the current alarm level (15 ppm)?

The alert and alarm levels should only apply to the beltline and not the intake. An alert requiring an investigation should be at 25 ppm in the intake and requiring an immediate evacuation if 50 ppm is reached or exceeded. The diesel regulations allow for 25 ppm or less for a working shift.

### POINT FEED REGULATOR

With the velocity requirement through the regulator, it shouldn't be necessary to have a remote closing device on the intake-to belt side of the regulator.

### POINT FEED LOCATIONS

We assume that if intake air is point fed into a beltline at an outby location and that air is not coursed to the sections, the regulator and additional carbon monoxide sensors does not apply. This could result from two point feed locations, one in the mains with the air directed to the return and one in a panel or inby area that goes outby to a return and inby to a section.

This requirement appears to be more appropriate to improving safety for point feeding intake air into a beltline versus addressing the issue of using belt air at the face. It is not a requirement of most existing petitions.

**AA76-HEAR-SUBMISSION**

### COMMUNICATION LINES IN SEPARATE ENTRIES

This is not practical, since trunk and branch lines of both the AMS and communication system must be placed in both entries.

This requirement appears to be more appropriate to improving mine communications requirements versus addressing the issue of using belt air at the face. It is not a requirement of most existing petitions.

### GENERAL COMMENT

These new rules exceed most if not all existing petitions. The petitions approved to-date are required to provide a level of protection equal to the level of protection afforded by the standard being petitioned. All existing petitions must have met that burden and the purpose (belt air to the working face) has not changed.

Thank you for the opportunity to comment here today!